

January 8, 2009
SAB026703

Robin Merod
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

**SUBJECT: COMMENTS TO TENTATIVE WASTE DISCHARGE REQUIREMENTS
FOR THE BYRON SANITARY DISTRICT WASTEWATER TREATMENT
PLANT**

Dear Robin:

This letter contains comments and suggested revisions to the Tentative Waste Discharge Requirements (TWDRs), including the Monitoring and Reporting Plan and supporting exhibits, for the Byron Sanitary District's (District) Wastewater Treatment Plant (WWTP) that you emailed on December 11, 2008. In addition, a red-line revision of the TWDR has been transmitted to you electronically. Each comment is provided below:

Finding 34: States that wastewater from Pond 2 "will be able to flow to the land application area as needed"; however, wastewater will be pumped from Pond 2. Nolte recommends changing the sentence to read "will be *pumped* to the land application area".

Finding 35: States that Pond 2 will be taken off-line and naturally attenuated before converting from parallel to series operating mode. During parallel operation, wastewater from the headworks will enter the Pond 2; however, Pond 2 is the final pond prior to discharge to the land application area during series operation. Due to the possibility of applying untreated wastewater, wastewater will not be applied to the land application area for a period of 30 days after the WWTP is converted from parallel to series operation. It is not the intent to isolate Pond 2 from the treatment train, and wastewater will flow from Pond 4 into Pond 2 during this 30 day period.

Nolte recommends replacing the sentence "Once the high BOD event has subsided, Pond 2 will be taken off-line and naturally attenuated prior to being utilized in the series configuration." with "Wastewater from Pond 2 will not be discharged to the land application area for a period of 30 days after converting from parallel to series configuration."

Finding 50: As discussed during the January 5, 2009 meeting, the superscript 2 on MW-7 will be changed to a superscript 3.

NOLTE ASSOCIATES, INC.

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Provision F.2: Footnote 2 of the table should be changed to read: "Concentration in *downgradient* monitoring wells cannot exceed the value obtained in background monitoring well(s) for that monitoring period."

Provision G.1.a: Nolte recommends changing the due date of the *Construction As-Built Completion Report* to 120 days after completion of the improvement and rehabilitation project, but no later than September 1, 2009.

Provision G.1.e: Nolte recommends changing the due date of the *Operation and Maintenance Plan* to September 1, 2009.

Monitoring and Reporting Plan: Change headers to read "BYRON SANITARY DISTRICT".

WWTF Effluent Monitoring: Requires that effluent samples be taken from Pond 5 or 6 "adjacent to the discharge point" when the ponds contain more than one foot of wastewater. Ponds 5 and 6 are overflow ponds and do not have a discharge point. Nolte recommends changing "discharge pipe" to "influent pipe".

Land Application Area Monitoring: Nolte recommends adding a footnote to the Rainfall constituent stating that rainfall will be taken from the California Irrigation Management Information System Brentwood Station (Station 47), which is located 5 miles northwest from the WWTP.

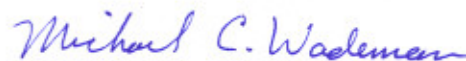
We appreciate the opportunity to meet with you and Mary earlier this week. Please feel free to contact me if you need any additional information.

Sincerely,

Nolte Associates, Inc.



David Dauwalder, P.E.
Project Manager



Michael Wademan, P.E.
Project Engineer